

KATSKY KORINS LLP
605 Third Avenue
New York, New York 10158
Telephone: (212) 953-6000
Facsimile: (212) 953-6899
Steven H. Newman, Esq.
snewman@katskykorins.com
Robert Abrams, Esq.
rabrams@katskykorins.com

Presentment Date: June 15, 2018, at 12:00 p.m. (New York time)
Objection Date: June 8, 2018

*Attorneys for Defendants Richard Spring
The Spring Family Trust, and The Jeanne T. Spring Trust*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,
Debtor.

SIPA LIQUIDATION

Case No. 08-01789 (SMB)

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IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 09-01305 (SMB)

Plaintiff,

v.

ALVIN J. DELAIRE, *et al.*,

Defendants.

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**NOTICE OF PRESENTMENT OF ORDER GRANTING APPLICATION TO
WITHDRAW AS SPECIAL COUNSEL FOR THE SPRING DEFENDANTS AND
REQUEST TO BE REMOVED FROM ELECTRONIC NOTICE AND SERVICE LISTS**

PLEASE TAKE NOTICE, that upon the annexed declaration of David B. Tatge, Esq.
for an order, pursuant to Local Bankruptcy Rule 2090-1(e), authorizing David B. Tatge and
Epstein Becker & Green, P.C. to withdraw as special counsel for Richard Spring, The Spring

Family Trust, and The Jeanne T. Spring Trust, and granting request to be removed from electronic notice and service lists, the undersigned will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for signature on June 15, 2018 at 12:00 p.m. (New York Time).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the proposed order must be made in writing and filed with Court (with a copy thereof delivered to the Bankruptcy Judge's chambers and to the undersigned) by June 8, 2018. The ECF docket number to which the filing relates should be included in the upper right hand corner of the caption of all objections. Unless objections are received by that date, the proposed order may be signed.

Dated: New York, New York
June 1, 2018

Respectfully submitted,
KATSKY KORINS LLP

By: /s/ Steven H. Newman
Steven H. Newman, Esq.
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New York, New York 10158
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snewman@katskykorins.com

*Attorneys for Defendants Richard Spring
The Spring Family Trust, and The Jeanne T.
Spring Trust*